

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America  
v.  
Fernando Cisneros (2000/USA)

Case No. M-21-790-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 13, 2021 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

21 USC § 952

Illegal Importation of a Controlled Substance / Approximately 51.72  
Kilograms of Methamphetamine, a Schedule II Controlled Substance.

21 USC § 963

Conspiracy to Illegally Import a Controlled Substance / Approximately 51.72  
Kilograms of Methamphetamine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

See Attachment "A"

United States District Court  
Southern District of Texas  
FILED

APR 14 2021

Nathan Ochsner, Clerk

☒ Continued on the attached sheet.

Complaint authorized by: AUSA Roberto Lopez

Submitted by reliable electronic means, sworn to  
and attested to telephonically per Fed. R. Cr. 4.1,  
and probable cause found on:

Date: 4/14/21 - 7:15 a.m.City and state: McAllen, Texas

/s/ Nicholas C. Stott

Complainant's signature

Nicholas C. Stott, HSI Special Agent

Printed name and title

Judge's signature

U.S. Magistrate Judge Juan F. Alanis

Printed name and title

**Attachment "A"**

I, Nicholas C. Stott, am a Special Agent of the United States Homeland Security Investigations (HSI) and have knowledge of the following facts. The facts related in this attachment do not reflect the totality of information known to me or other agents/officers, merely the amount needed to establish probable cause. I do not rely upon facts not set forth herein in reaching my conclusion that a complaint should be issued, nor do I request that this Court rely upon any facts not set forth herein in reviewing this attachment in support of the complaint.

1. On April 13, 2021, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection (CBP) Office of Field Operations (OFO) at the Hidalgo Port of Entry (POE) in Hidalgo, Texas. CBP Officers (CBPOs) detained Fernando Cisneros (hereinafter CISNEROS), a citizen of the United States, the driver and sole occupant of the vehicle, while attempting to enter the U.S. with approximately 51.72 kilograms (kg) of methamphetamine concealed within tires of the vehicle.
2. During primary inbound inspection, CBP Officers (CBPOs) obtained a negative oral declaration for fruits, food, alcohol, tobacco, drugs, weapons and currency over \$10,000.00. from CISNEROS. CBPOs referred CISNEROS and the vehicle to secondary inspection for an intensive examination.
3. During secondary inspection, the vehicle was X-rayed, revealing anomalies in all four tires of the vehicle. A CBP K-9 narcotics detection team conducted a free air inspection which resulted in a positive alert for the odor of controlled substance(s) emanating from the vehicle.
4. A physical search of the vehicle was conducted, and 24 cellophane wrapped packages, weighing approximately 51.72 kilograms, were discovered concealed within aftermarket constructed concealed compartments inside all four tires of the vehicle. CBPOs field tested the substance inside the packages which was presumptive positive for the properties and characteristics of methamphetamine.
5. Homeland Security Investigations (HSI), Special Agents (SA) responded to the Hidalgo POE to assist in the investigation. HSI SAs interviewed CISNEROS who stated he was hired by an unknown person in Mexico and to be paid \$1,000.00 USD to transport what he knew were drugs from Mexico to the United States.